

Jason Hartley, CA Bar No. 192514  
STUEVE SIEGEL HANSON LLP  
500 West C Street, Suite 1750  
San Diego, California 92101  
Telephone: 619-400-5822  
Facsimile: 619-400-5832  
Email: [hartley@stuevesiegel.com](mailto:hartley@stuevesiegel.com)

J. Toji Calabro, CA Bar No. 239950  
STUEVE SIEGEL HANSON LLP  
460 Nichols Road, Suite 200  
Kansas City, Missouri 64112  
Telephone: 816-714-7100  
Facsimile: 816-714-7101  
Email: [calabro@stuevesiegel.com](mailto:calabro@stuevesiegel.com)

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

CANH LE,

**Plaintiff,**

V.

## **DIRECTV, LLC.**

## Defendant.

Case No. 16-cv-01369 SVW-AS

**DECLARATION OF J. TOJI  
CALABRO IN OPPOSITION TO  
DEFENDANT'S MOTION FOR  
SUMMARY ADJUDICATION  
REGARDING FLSA CLAIMS AND  
DAMAGES**

**Date: September 11, 2017**

**Time: 1:30 p.m.**

## Courtroom: 10A

## **Hon. Stephen V. Wilson**

1 I, J. Toji Calabro, declares as follows:

2 1. I am an attorney at Stueve Siegel Hanson LLP, one of the attorneys  
3 for Plaintiffs in the above-entitled action and related cases<sup>1</sup>, and I make this  
4 declaration based on my own personal knowledge.

5 2. A true and correct copy of the cited portions of the transcript of the  
6 deposition of Paul Guzik taken on 12/9/16 in the CDCA cases is attached and  
7 incorporated herein as Exhibit 132.

8 3. A true and correct copy of the cited portions of Plaintiff Paul Guzik's  
9 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is attached  
10 and incorporated herein as Exhibit 133.

11 4. A true and correct copy of the cited portions of the transcript of the  
12 deposition of Armando Solis Juarez taken on 12/13/16 in the CDCA cases is  
13 attached and incorporated herein as Exhibit 134.

14 5. A true and correct copy of the cited portions of Plaintiff Armando Soli  
15 Juarez's 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is  
16 attached and incorporated herein as Exhibit 135.

17 6. A true and correct copy of the cited portions of the transcript of the  
18 deposition of Jeffrey Kidd taken on 11/29/16 in the CDCA cases is attached and  
19 incorporated herein as Exhibit 136.

20 7. A true and correct copy of the cited portions of Plaintiff Jeffrey  
21 Kidd's 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is  
22 attached and incorporated herein as Exhibit 137.

---

24 <sup>1</sup> "Plaintiffs" are Canh Le (Case No. 2:16-cv-01369-SVW-AS), Jeremy Lasater  
25 (Case No. 2:16-cv-01373-SVW-AS), David Varas (Case No. 2:16-cv-01395-  
26 SVW-AS), Mendamar Lkhagvadorj (Case No. 2:16-cv-01502-SVW-AS), Henry  
27 Trujeque (Case No. 2:16-cv-01477-SVW-AS), Paul Guzik (Case No. 2:16-cv-  
28 01967-SVW-AS), Jeffrey Kidd (Case No. 2:16-cv-01506-SVW-AS), Armando  
Solis Juarez (Case No. 5:16-cv-00400-SVW-AS), and Jamie Nault (Case No. 2:16-  
cv-05721-SVW-AS) (collectively, the "related cases").

8. A true and correct copy of the cited portions of the transcript of the deposition of Jeremy Lasater taken on 10/20/16 in the CDCA cases is attached and incorporated herein as Exhibit 138.

9. A true and correct copy of the cited portions of Plaintiff Jeremy Lasater's 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is attached and incorporated herein as Exhibit 139.

10. A true and correct copy of the cited portions of the transcript of the deposition of Canh Le taken on 10/14/16 in the CDCA cases is attached and incorporated herein as Exhibit 140.

11. A true and correct copy of the cited portions of Plaintiff Canh Le's 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is attached and incorporated herein as Exhibit 141.

12. A true and correct copy of the cited portions of the transcript of the deposition of Mendamar Lkhagvadorj taken on 11/2/16 in the CDCA cases is attached and incorporated herein as Exhibit 142.

13. A true and correct copy of the cited portions of Plaintiff Mendomar Lkhagvadorj's 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is attached and incorporated herein as Exhibit 143.

14. A true and correct copy of the cited portions of the transcript of the deposition of Jaime Nault taken on 12/5/16 in the CDCA cases is attached and incorporated herein as Exhibit 144.

15. A true and correct copy of the cited portions of Plaintiff Henry Trujeque's 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is attached and incorporated herein as Exhibit 145.

16. A true and correct copy of the cited portions of the transcript of the deposition of David Varas taken on 10/24/16 in the CDCA cases is attached and incorporated herein as Exhibit 146.

17. A true and correct copy of the cited portions of Plaintiff David Varas' 3/22/2016 Responses to DIRECTV, LLC's First Set of Interrogatories is attached and incorporated herein as Exhibit 147.

18. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DIRECTV\_GENERAL0000042660 is attached and incorporated herein as Exhibit 148.

19. A true and correct copy of the cited portions of the transcript of the deposition of Christopher Altomari taken in the *Arnold v. DIRECTV, LLC* on 3/5/2015 is attached and incorporated herein as Exhibit 149.

20. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00026747 is attached and incorporated herein as Exhibit 150.

21. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00027462 is attached and incorporated herein as Exhibit 151.

22. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-GLOBAL00376794 is attached and incorporated herein as Exhibit 152.

23. A true and correct copy of the cited portions of the transcript of the deposition of Marc Mastin taken on 11/11/15 in the CDCA cases is attached and incorporated herein as Exhibit 153.

24. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00030877 is attached and incorporated herein as Exhibit 154.

25. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00030974 is attached and incorporated herein as Exhibit 155

26. A true and correct copy of the cited portions of the transcript of the deposition of Kyle Wells taken on 9/11/15 in *Arndt v. DIRECT, LLC* is attached and incorporated herein as Exhibit 156.

27. A true and correct copy of the cited portions of the transcript of the deposition of William Bennett taken on 12/6/16 in the CDCA cases is attached and incorporated herein as Exhibit 157.

28. A true and correct copy of the cited portions of the transcript of the deposition of Matt Gray taken on 2/22/17 in the CDCA cases is attached and incorporated herein as Exhibit 158.

29. A true and correct copy of the cited portions of the transcript of the deposition of Mary Ellen Baumgardt taken on 7/13/2011 in *Arnold v. DIRECTV, Inc.*, is attached and incorporated herein as Exhibit 159.

30. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00028925 is attached and incorporated herein as Exhibit 160.

31. A true and correct copy of the confidential cited portions of the transcript of the deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and incorporated herein as Exhibit 161.

32. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-GLOBAL00090676 is attached and incorporated herein as Exhibit 162.

33. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_GUZIK\_000143 is attached and incorporated herein as Exhibit 163.

34. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00004341 is attached and incorporated herein as Exhibit 164.

35. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00018711 is attached and incorporated herein as Exhibit 165.

36. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_JUAREZ\_000107 is attached and incorporated herein as Exhibit 166.

37. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_LE\_000050 is attached and incorporated herein as Exhibit 167.

38. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_NAULT\_000150 is attached and incorporated herein as Exhibit 168.

39. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_VARAS\_000056 is attached and incorporated herein as Exhibit 169.

40. A true and correct copy of the cited portions of the transcripts of the depositions of Maria Shropshire taken on 10/28/16 and 11/4/16 in the CDCA cases are attached and incorporated herein as Exhibit 170.

41. A true and correct copy of the cited portions of the transcripts of the deposition of Henry Trujeque taken on 11/1/16 in the CDCA cases is attached and incorporated herein as Exhibit 171

42. A true and correct copy of the cited portions of the transcripts of the deposition of Paul Yang taken on 4/26/17 in the CDCA cases is attached and incorporated herein as Exhibit 172.

43. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00015666 is attached and incorporated herein as Exhibit 173.

44. A true and correct copy of the cited portions of the transcripts of the deposition of Deshon Gipson taken on 4/19/17 in the CDCA cases are attached and incorporated herein as Exhibit 174.

45. A true and correct copy of the cited portions of the transcripts of the deposition of Kyle Wells taken on 11/11/15 in the *Field v. DIRECTV, LLC* is attached and incorporated herein as Exhibit 175.

46. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_GUZIK\_000211 is attached and incorporated herein as Exhibit 176.

47. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_GUZIK\_000212 is attached and incorporated herein as Exhibit 177.

48. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_JUAREZ\_000184 is attached and incorporated herein as Exhibit 178.

49. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_KIDD\_000166 is attached and incorporated herein as Exhibit 179.

50. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_LASATER\_000219 is attached and incorporated herein as Exhibit 180.

51. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_LE\_000101 is attached and incorporated herein as Exhibit 181.

52. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_LKHAGVADORJ\_000156 is attached and incorporated herein as Exhibit 182.

53. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_LKHAGVADORJ\_000132 is attached and incorporated herein as Exhibit 183.

54. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_NAULT\_000210 is attached and incorporated herein as Exhibit 184.

55. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_NAULT\_000211 is attached and incorporated herein as Exhibit 185.

56. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_TRUJEQUE\_000288 is attached and incorporated herein as Exhibit 186.

57. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_VARAS\_000152 is attached and incorporated herein as Exhibit 187.

58. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00013542 is attached and incorporated herein as Exhibit 188.

59. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00007112 is attached and incorporated herein as Exhibit 189.

60. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00009842 is attached and incorporated herein as Exhibit 190.

61. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00008699 is attached and incorporated herein as Exhibit 191.

62. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00024334 is attached and incorporated herein as Exhibit 192.

63. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-GLOBAL00133759-60 is attached and incorporated herein as Exhibit 193.

64. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-GLOBAL00449907-08 is attached and incorporated herein as Exhibit 194.

65. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-Global00086921 and marked as Ex. 9 during the deposition of Adrian Dimech taken 11/3/16 in the CDCA cases is attached and incorporated herein as Exhibit 195.

66. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-TRUJEQUE00000312 and marked as Exhibit 2 during the deposition of Paul Yang taken on 4/26/17 in the CDCA cases is attached and incorporated herein as Exhibit 196.

67. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DIRECTV-Roeder00008707-08 is attached and incorporated herein as Exhibit 197.

68. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DIRECTV-Andersen031794, 96 is attached and incorporated herein as Exhibit 198.

69. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-GLOBAL00335358, 75 is attached and incorporated herein as Exhibit 199.

70. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-GLOBAL00426023, 47 is attached and incorporated herein as Exhibit 200.

71. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00000473, 502 is attached and incorporated herein as Exhibit 201.

72. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00001065, 95 is attached and incorporated herein as Exhibit 202.

73. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00027595, 650 is attached and incorporated herein as Exhibit 203.

74. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00000666, 703 is attached and incorporated herein as Exhibit 204.

75. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-GLOBAL00254287, 94 is attached and incorporated herein as Exhibit 205.

76. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00004881, 915 is attached and incorporated herein as Exhibit 206

77. A true and correct copy of the confidential cited portions of the transcript of the deposition of Adrian Dimech taken on 11/3/16 in the CDCA cases is attached and incorporated herein as Exhibit 207.

78. A true and correct copy of the cited portions of the transcript of the deposition of David Baker taken on 8/25/16 in the *Arndt v. DIRECTV, LLC* is attached and incorporated herein as Exhibit 208.

79. A true and correct copy of the cited portions of the transcript of the deposition of Drew Berryessa taken on 11/1/16 in the CDCA cases is attached and incorporated herein as Exhibit 209.

80. A true and correct copy of the cited portions of the transcript of the deposition of Michael Butao taken on 11/4/2016 in the CDCA cases is attached and incorporated herein as Exhibit 210.

81. A true and correct copy of the cited portions of the transcript of the deposition of Roy Cienfuegos taken on 11/10/16 in the CDCA cases is attached and incorporated herein as Exhibit 211.

82. A true and correct copy of the cited portions of the transcript of the deposition of Steven Crawford taken on 11/8/16 in the CDCA cases is attached and incorporated herein as Exhibit 212.

83. A true and correct copy of the cited portions of the transcript of the deposition of William McCarty taken on 10/21/16 in the CDCA cases is attached and incorporated herein as Exhibit 213.

84. A true and correct copy of the cited portions of the transcript of the deposition of Michael Perez taken on 4/14/17 in the CDCA cases is attached and incorporated herein as Exhibit 214.

85. A true and correct copy of the cited portions of the transcript of the deposition of David Baker taken *Arnold v. DIRECTV, LLC* on 5/21/15 is attached and incorporated herein as Exhibit 215.

86. A true and correct copy of the cited portions of the transcript of the deposition of Kyle Wells taken in *Andersen v. DIRECTV, LLC* on 5/24/16 is attached and incorporated herein as Exhibit 216.

87. A true and correct copy of the cited portions of the transcript of the deposition of Todd Bartlett taken in *Field v. DIRECTV, LLC* on 11/12/15 is attached and incorporated herein as Exhibit 217.

88. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00022911 and marked as Ex. 38 during the deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and incorporated herein as Exhibit 218.

89. A true and correct copy of a document produced by DIRECTV on behalf of Christian Installation Group Inc to Plaintiffs labeled CHRISTIANINSTALLATION\_DTV000012 and marked as Exhibit 2 in the deposition of Michael Perez taken on 4/14/17 in the CDCA cases is attached and incorporated herein as Exhibit 219.

90. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-LASATER00002788 is attached and incorporated herein as Exhibit 220.

91. A true and correct copy of the cited portions of the transcript of the deposition of Todd Bartlett taken in *Andersen v. DIRECTV, LLC* on 5/24/16 is attached and incorporated herein as Exhibit 221.

92. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00013089 is attached and incorporated herein as Exhibit 222.

93. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CDCA00005873 and marked as Ex. 7 during the deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and incorporated herein as Exhibit 223.

94. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-LASATER00002722 and marked as Exhibit 22 in the deposition of Jeremey Lasater taken on 10/20/16 in the CDCA cases is attached and incorporated herein as Exhibit 224.

95. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_Guzik00278 is attached and incorporated herein as Exhibit 225.

96. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_Guzik00284 is attached and incorporated herein as Exhibit 226.

97. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_Guzik00290 is attached and incorporated herein as Exhibit 227.

98. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_Guzik00295 is attached and incorporated herein as Exhibit 228.

99. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_Guzik00300 is attached and incorporated herein as Exhibit 229.

100. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_Guzik00305 is attached and incorporated herein as Exhibit 230.

101. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-KIDD00000005 is attached and incorporated herein as Exhibit 231

102. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-KIDD00001824 is attached and incorporated herein as Exhibit 232.

103. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-KIDD00002015 is attached and incorporated herein as Exhibit 233

1           104. A true and correct copy of a document produced by Plaintiffs to  
2 DIRECTV labeled PLTF-KIDD00002255 is attached and incorporated herein as  
3 Exhibit 234.

4           105. A true and correct copy of a document produced by Plaintiffs to  
5 DIRECTV labeled PLTF-KIDD00002452 is attached and incorporated herein as  
6 Exhibit 235.

7           106. A true and correct copy of a document produced by Plaintiffs to  
8 DIRECTV labeled PLTF-KIDD00002654 is attached and incorporated herein as  
9 Exhibit 236.

10          107. A true and correct copy of a document produced by Plaintiffs to  
11 DIRECTV labeled PLTF-KIDD00002827 is attached and incorporated herein as  
12 Exhibit 237.

13          108. A true and correct copy of a document produced by Plaintiffs to  
14 DIRECTV labeled PLTF-KIDD00003069 is attached and incorporated herein as  
15 Exhibit 238.

16          109. A true and correct copy of a document produced by Plaintiffs to  
17 DIRECTV labeled PLTF-KIDD00003353 is attached and incorporated herein as  
18 Exhibit 239.

19          110. A true and correct copy of a document produced by Plaintiffs to  
20 DIRECTV labeled PLTF-KIDD00003450 is attached and incorporated herein as  
21 Exhibit 240.

22          111. A true and correct copy of a document produced by Plaintiffs to  
23 DIRECTV labeled PLTF-KIDD00003469 is attached and incorporated herein as  
24 Exhibit 241.

25          112. A true and correct copy of a document produced by Plaintiffs to  
26 DIRECTV labeled PLTF-KIDD00003512 is attached and incorporated herein as  
27 Exhibit 242.

113. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-KIDD00003715 is attached and incorporated herein as Exhibit 243.

114. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-LASATER00002438-2540 is attached and incorporated herein as Exhibit 244.

115. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-LASATER00002541-2549 is attached and incorporated herein as Exhibit 245.

116. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-LASATER00002550-2633 is attached and incorporated herein as Exhibit 246.

117. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_LE\_000154 is attached and incorporated herein as Exhibit 247.

118. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_LE\_000157 is attached and incorporated herein as Exhibit 248.

119. A true and correct copy of a document produced by DIRECTV to Plaintiffs labeled DTV-CA\_LE\_000158 is attached and incorporated herein as Exhibit 249

120. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-LE00000024 is attached and incorporated herein as Exhibit 250

121. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-LKHAGVADORJ00000198 is attached and incorporated herein as Exhibit 251

122. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-LKHAGVADORJ00000199 is attached and incorporated herein as Exhibit 252.

123. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-NAULT00000571 is attached and incorporated herein as Exhibit 253.

124. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-NAULT00000604 is attached and incorporated herein as Exhibit 254.

125. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-NAULT00000683 is attached and incorporated herein as Exhibit 256.

126. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-NAULT00000574 is attached and incorporated herein as Exhibit 257.

127. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-NAULT00000612 is attached and incorporated herein as Exhibit 257.

128. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-JUAREZ00000040 is attached and incorporated herein as Exhibit 258.

129. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-JUAREZ00000171 is attached and incorporated herein as Exhibit 259.

130. A true and correct copy of a document produced by Plaintiffs to DIRECTV labeled PLTF-JUAREZ00000197 is attached and incorporated herein as Exhibit 260.

1       131. A true and correct copy of a document produced by Plaintiffs to  
2 DIRECTV labeled PLTF-JUAREZ00000201 is attached and incorporated herein  
3 as Exhibit 261.

4       132. A true and correct copy of a document produced by DIRECTV to  
5 Plaintiffs labeled DTV-CA\_TRUJEQUE\_000257 is attached and incorporated  
6 herein as Exhibit 262.

7       133. A true and correct copy of a document produced by DIRECTV to  
8 Plaintiffs labeled DTV-CA\_TRUJEQUE\_000323-24 is attached and incorporated  
9 herein as Exhibit 263.

10       134. A true and correct copy of a document produced by DIRECTV to  
11 Plaintiffs labeled DTV-CA\_TRUJEQUE\_000262 is attached and incorporated  
12 herein as Exhibit 264.

13       135. A true and correct copy of a document produced by Plaintiffs to  
14 DIRECTV labeled PLTF-VARAS00000038 is attached and incorporated herein as  
15 Exhibit 265.

16       136. A true and correct copy of a document produced by Plaintiffs to  
17 DIRECTV labeled PLTF-VARAS00000040 is attached and incorporated herein as  
18 Exhibit 266.

19       137. A true and correct copy of a document produced by Plaintiffs to  
20 DIRECTV labeled PLTF-VARAS00000043 is attached and incorporated herein as  
21 Exhibit 267.

22       138. A true and correct copy of the cited portions of the transcript of the  
23 deposition of Cameron Malanify taken on 10/28/16 in the CDCA cases is attached  
24 and incorporated herein as Exhibit 268.

25       139. A true and correct copy of a document produced by DIRECTV to  
26 Plaintiffs labeled DTV-CDCA00029315 and marked as Ex. 34 during the

1 deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and  
2 incorporated herein as Exhibit 269.

3 140. A true and correct copy of a document produced by DIRECTV to  
4 Plaintiffs labeled DTV-CDCA00024138 is attached and incorporated herein as  
5 Exhibit 270.

6 141. A true and correct copy of a document produced by DIRECTV to  
7 Plaintiffs labeled DTV\_CDCA00015678 and marked as Ex. 45 during the  
8 deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and  
9 incorporated herein as Exhibit 271.

10 142. A true and correct copy of a document produced by DIRECTV to  
11 Plaintiffs labeled DTV-CDCA00013290 and marked as Ex. 15 during the  
12 deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and  
13 incorporated herein as Exhibit 272.

14 143. A true and correct copy of a document produced by DIRECTV to  
15 Plaintiffs labeled DTV-CDCA00014025 and marked as Ex. 44 during the  
16 deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and  
17 incorporated herein as Exhibit 273.

18 144. A true and correct copy of a document produced by DIRECTV to  
19 Plaintiffs labeled DTV-CDCA00027551 and marked as Ex. 10 during the  
20 deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and  
21 incorporated herein as Exhibit 274.

22 145. A true and correct copy of a document produced by DIRECTV to  
23 Plaintiffs labeled DTV-CDCA00008834 and marked as Ex. 12 during the  
24 deposition of David Baker taken on 3/22/17 in the CDCA cases is attached and  
25 incorporated herein as Exhibit 275.

146. A true and correct copy of Consent Judgment and Order filed on 10/7/15 in *Perez v. Lantern Light Corp., DIRECTV, LLC* is attached and incorporated herein as Exhibit 276.

147. A true and correct copy of an email from Jonathan Slowik to J. Toji Calabro dated 11/18/2016 reaffirming Defendant document production issues raised at Lkhagvadorj's deposition taken 11/2/16 in the CDCA cases is attached and incorporated herein as Exhibit 277.

148. A true and correct copy of the cited portions of the transcript of the deposition of Steven Crawford taken on 10/13/15 in *Ardnt v. DIRECTV, LLC* is attached and incorporated herein as Exhibit 268.

149. A true and correct copy of the North American Industry Classification System Manuel of 2017 is attached and incorporated herein as Exhibit 279.

150. A true correct copy of an email from J. Toji Calabro to Jonathan Slowik dated 6/23/17 responding to a question posed during a telephone conference conducted 6/23/17 is attached and incorporated herein as Exhibit 280.

151. A true and correct copy of a letter from J. Toji Calabro to Galit Knotz dated 10/5/16 memorializing telephone conference conducted 10/2/16 is attached and incorporated herein as Exhibit 281.

152. A true and correct copy of the Declaration of Plaintiff Jamie Nault filed on 9/11/17 in the CDCA cases is attached and incorporated herein as Exhibit 282.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 9, 2017 at Kansas City, Missouri.

s/J. Toji Calabro  
J. Toji Calabro